

Proceeding: In the Matter of 1998 Biennial Regulatory Review -- Amendment of Part of the ☒ Record 1 of 1

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I respectfully submit the following comments regarding the commissions proposed restructuring of the amateur radio license classes.

The first observation I can not overlook is the movement to try and make the cw requirement somewhere below absurd. I would implore the FCC to maintain, if nothing else, a cw test of any sort in order to obtain HF operating privileges. Second, the FCC plan is something that I believe amateurs can live with. The package that the ARRL is trying to market is insulting, at best.

I think the multiple choice exams, current requirements for a medical waiver, novice subbands, and 200 watt power restriction all work very well, and should be left intact.

In the interest of streamlining the licenses. I would be in favor of the following:

Technician: This would be the same "no code" ticket it is today, and should not include any HF operating privileges.

General: A 5 wpm cw test, and a more aggressive written exam. The operating area would be that of a current General Class license holder.

Advanced: A 10 wpm cw test, and a written exam. I don't think the Advanced exam needs to be made any more difficult, it's already plenty tough. The operating range would again be the same as it is currently.

Extra: A 15 wpm cw test, and again the written exam will need to be made more thorough. Successful completion would give the holder privileges on all of the spectrum allocated for amateur use.

The original proposal as I read it from the FCC asked for comments pertaining to disciplining the trouble makers. While hams do a pretty decent job of policing themselves, there are instances when some official intervention is required. I don't think anything would be more effective than additional field inspectors.

Allocating a small portion of certain cw subbands, and an equal amount of the General phone section of the same band for digital purpose seems like it might be a bit premature. However, if that's what it would take to encourage further experimenting in those modes, as well as creating additional avenues for emergency traffic, when needed, then it would be a good idea.

I've read the ARRL's proposal and am convinced that they are trying to boost membership under the guise of attracting more people into the service/hobby. It's also a safe bet that the equipment manufacturers would like to see the Morse Code requirement vanish. Both of these are lousy reasons. CW is not intended to prevent anyone from obtaining HF privileges. It is a way to ensure that an operator is proficient in both of the most popular operating modes, phone and CW. I don't think anyone would like to be sending a distress call to a bunch of operators that couldn't even copy it at three or four words a minute.

In closing, I would like to reiterate that any cheapening of the standards set forth to obtain an amateur radio operator license, would make it very difficult for us to perform the service for which we were created.

Thank you,

Eric Sonnenwald N2XSE Advanced